



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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January 29, 2008

BY HAND

Honorable Leonard B. Sand  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1650  
New York, NY 10007

Re: *Socorro v. City of New York, et al.*, 08-CV-0134(LBS)(HBP)

Dear Judge Sand:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department handling the defense of this action on behalf of defendant City of New York. I am writing with the consent of plaintiffs' counsel, Richard Southard, Esq., to request a thirty-day enlargement of time, from January 29, 2008 to February 29, 2008, within which this office may answer or otherwise respond to the complaint. This is the City's first request for an enlargement of time in this action.

The plaintiff alleges, *inter alia*, violations of her constitutional rights under the Fourth and Fourteenth Amendments, when she was allegedly falsely arrested and sexually assaulted by police officers. Plaintiff also appends supplemental state law claims.

Before this office can adequately respond to the complaint, we will need to conduct an investigation into the facts of the case. Accordingly, the enlargement of time will afford us the opportunity to fully investigate the matter and to secure the relevant documents.

**MEMO ENDORSED**

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In view of the foregoing, it is respectfully requested that the Court grant the within request extending the City's time to answer or otherwise respond to the complaint until February 29, 2008.

Thank you for your consideration of this matter.

Respectfully submitted,



Hugh A. Zuber (HZ 4935)  
Assistant Corporation Counsel



1/31/08

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**MEMO ENDORSED**